UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 0 3 2019

Via USPS Certified Mail No. 7018 0360 0000 6461 2055

Steve Ward
Environmental Engineer
GIT, Inc.
1660 Sinton Road
Santa Maria, California 93458

Re: EPA Comments on California Asphalt Production, Inc.'s April 1, 2019 Work Plan
RCRA 3013-09-2019-0001

Dear Mr. Ward:

EPA has reviewed the April 1, 2019 Work Plan that was developed by California Asphalt Production, Inc. in response to EPA's February 19, 2019 RCRA 3013 Order. Comments to the work plan are attached.

Sincerely yours,

Rick Sakow
Acting Manager, Hazardous Waste and Chemical Section
Enforcement Division
U.S. Environmental Protection Agency, Region 9

Enclosure

cc via email with enclosure: Russell B. Selman, Schiff Hardin
rselman@schiffhardin.com
Susan Whalen, Law Office of Susan M. Whalen
susan@whalenattorney.com

EPA Comments to the California Asphalt Production, Inc. Work Plan, dated April 1, 2019

Administrative Revisions

1. Table 1-1 Key Project Personnel Contact Information and Responsibilities (page 6) should be updated as following. The EPA Project Officer is Rick Sakow, Enforcement Officer, 415-972-3495, sakow.rick@epa.gov. Responsibilities include: Oversee implementation of 3013 action items and deliverables.

   The EPA Quality Assurance Officer (QAO) should be updated to Audrey L Johnson, Manager, EPA Region 9 Quality Assurance Office. (415) 972-3431 Johnson.AudreyL@epa.gov.

2. Section 5.3 Ground Water Sampling (Page 13). CAP indicates the proposed locations of borings DH-1 through DH-3 are found on Figure 4. The proposed boring locations are found on Figure 3.

Technical Revisions

3. Section 5.1 Surface Soil Sampling (page 13).
   a. The U. S. Environmental Protection Agency (EPA), Region 9 concurs with the described soil sampling selection process. However, there is no detailed written description included in this section that describes how the samples will be obtained, including equipment to be used, preserved, decontamination processes between sampling, and proposed sample depth limit based on the type of equipment being used to obtain surface samples. EPA will want CAP to obtain soil samples that have not been directly exposed to the atmosphere.

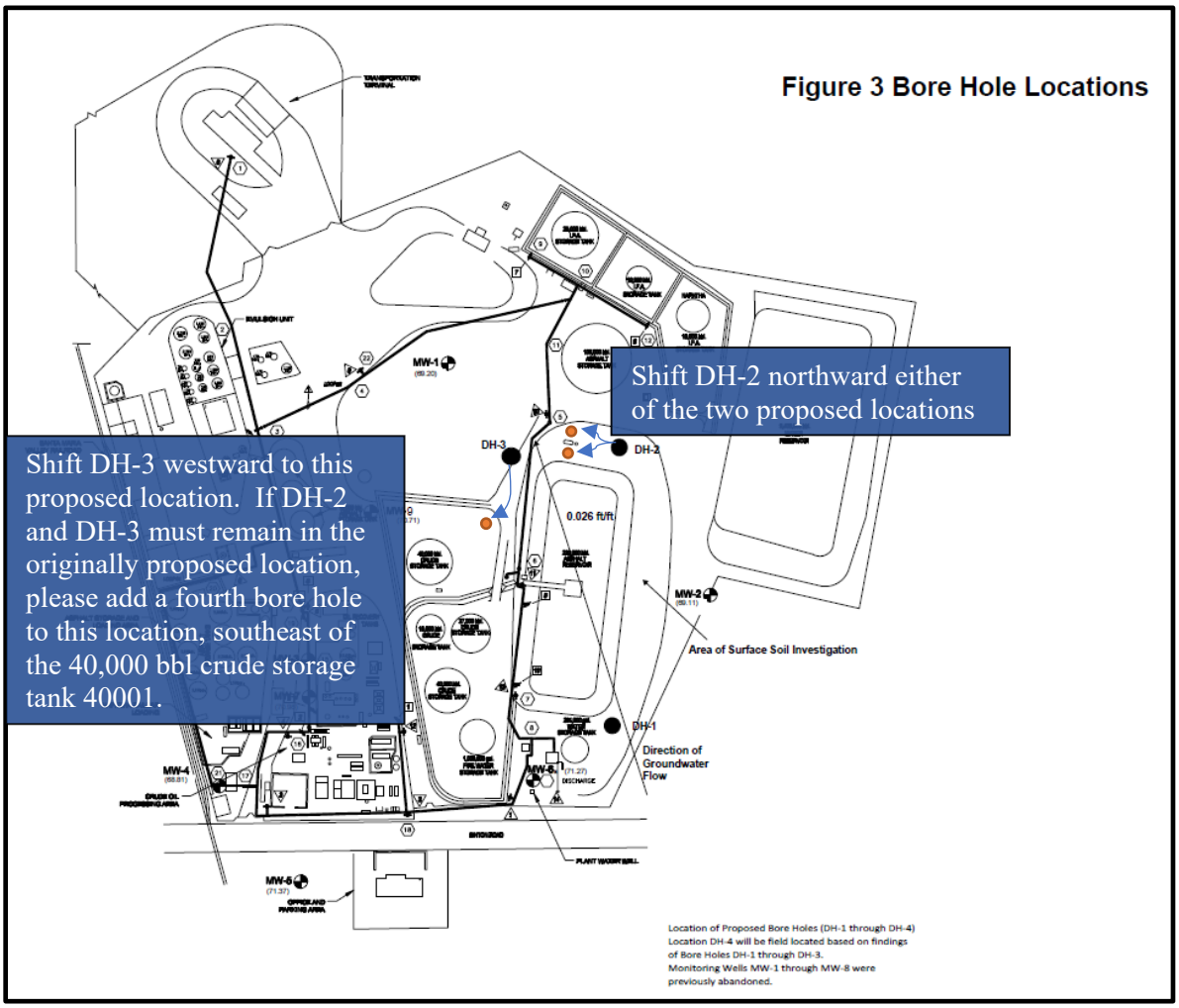
   b. CAP states that staining and/or a PID will be used to identify soil samples to be collected and analyzed. Calibration data for any field equipment (e.g., PID, pH meter, etc.) used by CAP must be included in any analytical data reports prepared and submitted by CAP to EPA.

4. Section 5.2 Subsurface Soil Sampling (page 13). EPA concurs with the three (3) boring approach, reserving the option of a 4th boring based on a site walk of the surface impoundment area (aka Asphalt Storage Unit or ASU).

5. Section 5.3 Ground Water Sampling (Page 13).
   a. Please clarify if the boring number used in the work plan will be the same number used to identify the monitoring well.

   b. EPA is in agreement with the proposed location of boring DH-1. EPA reviewed groundwater data from the California Regional Water Quality Control Board and other sources to evaluate the direction of groundwater flow around the California Asphalt Production facility. Based on this review, EPA suggests moving the locations DH-2 and DH-3, as shown below. If moving the locations of DH-2 and

DH-3 is unworkable, EPA suggests installing an additional monitoring well between crude oil storage tank 40001 and the surface impoundment, also shown below.



6. Section 5.4 Other Sampling, Process Sampling Justification (Page 14).

   a. During the site walk EPA and CAP representative may identify other process wastewater streams that are discharged to the surface impoundment to be sampled.

   b. CAP states that sampling of the ASU accumulated water or waste is difficult due to the fact the surface is not stable enough to support sampling personnel or equipment safely. EPA does want a sample obtained and analyzed from underneath the ASU surface materials. There is a platform that extends over the surface impoundment. EPA personnel observed that there may be access points using a hand-held pump fitted with a teflon tubing which could be used to obtain wastewater samples from underneath the surface impoundment cap. EPA requests CAP to develop a safe plan to obtain a process wastewater sample(s) from underneath the cap.

7. Table 6-1 Media Sampling Plan (Page 16).
    a. EPA is requiring aqueous and solid samples to be analyzed for total and TCLP RCRA metals and VOCs, as well as SVOCs and PAHs. Please add SW-846, Method 1311 to the "Analyses Method" specified in Table 6-1 for RCRA metals or VOCs.

    b. For groundwater and process wastewaters, EPA suggests that filterable solids be added to the analytical methods listed in the table. If the total filterable solids are less than 0.5% the wastewater itself, after filtering, is considered the extract for the purpose of the TCLP analysis.

    c. Please verify that pH will be measured in the field for all process and groundwater samples obtained for analysis. Additionally, groundwater samples will be analyzed for specific conductance and temperature.

8. Section E, Paragraph 32.a.iv of the 3013 Administrative Order, RCRA 3013-09-2019-0001, dated February 19, 2019 requires CAP to perform a structural assessment survey of the surface impoundment. There is no structural surface impoundment survey discussion included in the CAP Work Plan. EPA is requiring the survey to ensure that there is not a potential for the surface impoundment to fail. The survey must identify areas of concern, such as slope stability, erosion concerns, types of erosion observed (e.g., rill erosion), woody vegetation, animal holes, toe water seeps, construction issues, etc. that will negatively impact the integrity of the surface impoundment structure.